

# FARMERS & MERCHANTS STATE BANK

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President



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Mr. Gerard Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

FEB01'16 PM 2:45 BOARD

Dear Mr. Poliquin:

I am writing in regards to the proposed revisions to the NCUA Chartering & Field of Membership, Part 701.

The changes proposed for the geographic field of membership rules are far too broad. The FCU Act requires that a geographic field of membership must be a "well defined local community". In this proposal, the NCUA mandates that a single Congressional district is automatically a "well defined, local community". That change defies logic in many cases. Minnesota has eight Congressional districts, and a couple of them are very large, geographically. Minnesota's 7<sup>th</sup> Congressional District covers 33,429 square miles, and it takes seven hours to drive from one end of the district to the other. There is no way that people living seven hours apart from each other would believe that they are part of the same "local" community. And in seven states, it is even worse because there is just one Congressional district covering the whole state. It is very difficult to see how an entire state can be considered a "local" community. That aspect of the proposal clearly goes too far.

Thank you for the opportunity to comment on this proposal.

Allan L. Berube  
President